

June 17, 2024

VIA ECF

Hon. Cecelia G. Morris
United States Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *In re*: Norman A. Kellyman (“Debtor”),
Case No. 22-22915 (CGM)
Loss Mitigation Status Report / Loss Mitigation Order April 10, 2023 (doc # 14).

Dear Judge Morris:

This firm is counsel to Carrington Mortgage Services, LLC, servicer for J.P. Morgan Mortgage Acquisition Corp. (“Secured Creditor,” or “Carrington”).

On October 30, 2023, the loan was transferred to the Secured Creditor from Waterfall Victoria Grantor Trust II, Series G servicer for Specialized Loan Servicing, LLC (doc #42).

On November 13, 2023 and on December 20, 2023, Carrington issued “Additional Documentation Required” notices, which were promptly provided to debtor’s counsel. On January 4, 2024, debtor’s counsel provided copies of bank statements for the months of October 2023 and November 2023, which were immediately forwarded to the Secured Creditor for review the same day.

Carrington again issued an “Additional Documentation Required” notice on February 12, 2024, provided to debtor’s counsel on February 14, 2024. Debtor’s counsel submitted new loss mitigation package that was forwarded to the Secured Creditor on February 22, 2024.

On March 14, 2024, Carrington issued “Your Application is Complete” Notice, which was provided to the debtor’s counsel on March 20, 2024. The March 20, 2024 Notice indicated that while Secured Creditor deemed debtor’s application as complete, additional information may be required once the loss mitigation package, dated February 22, 2024, is reviewed.

On March 27, 2024, Carrington issued “Additional Documentation Required” Notice, which was provided to debtor’s counsel on April 1, 2024. Creditor now awaits receipt of additional documents from the debtor, to determine debtor’s eligibility for a loan modification.

On May 11, 2024, Debtor’s counsel provided this with additional documents, which were forwarded to Carrington on May 13, 2024 for a review and evaluation.

Presently, the Secured Creditor is reviewing all provided by the Debtor documentation and information in order to determine of the Debtor qualifies for any available Loan Modifications.

In the light of the above, the Secured Creditor respectfully requests that this Court continue June 20, 2024 Loss Mitigation Status hearing for approximately 30 days to allow more time to make a loss mitigation determination in this bankruptcy case.

Respectfully submitted,

/s/Michael F. Medved

Michael F. Medved, Esq.